

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
)

Implementation of Non-Accounting)
Safeguards of Sections 271 and 272)
of the Communications Act of 1934,)
as amended)
_____)

CC Docket No. 96-149

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FEDERAL COMMUNICATIONS COMMISSION
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COMMENTS OF AT&T CORP.

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SUMMARY

AT&T strongly supports the Commission's conclusion in its First Report and Order in this proceeding that data disclosure requirements are essential to implement § 272(e)(1)'s requirement that BOCs not discriminate in favor of themselves or their affiliates in provisioning telephone exchange service and exchange access. Imposing reporting requirements pursuant to § 272(e)(1) will serve both to monitor compliance with that section and to permit enforcement of its requirements.

The service categories proposed in Appendix C to the Further Notice of Proposed Rulemaking represent precisely the kinds of information necessary to implement § 272(e)(1) and should be adopted by the Commission. However, AT&T believes that the categories proposed in Appendix C should be modified to indicate whether a BOC fulfills requests not only within its self-imposed deadline, but within the period in which its "customer" (here, the BOC itself or its affiliate) requested service.

AT&T also urges the Commission to adopt four additional metrics in addition to those proposed in the FNPRM to measure provisioning of exchange access. The first of these, "Jeopardy Notification Provided" is a critical adjunct to Category 2 in Appendix C. The remaining three metrics AT&T proposes relate to the quality of BOC

provisioning. The measures proposed in Appendix C relate only to the speed with which a BOC provides exchange access-related services. A BOC could not reasonably be deemed to have achieved a nondiscriminatory service interval if an unaffiliated entity is provisioned with lower quality services than the BOC provides itself. Accordingly, the FNPRM is incomplete insofar as it measures only one aspect of § 272(e)(1)'s nondiscriminatory provisioning requirements.

Further, the plain language of § 272(e)(1) mandates nondiscriminatory fulfillment of requests for telephone exchange service as well as exchange access. Accordingly, in its comments AT&T proposes a format for a report addressing BOCs' provisioning of local exchange services and facilities.

Finally, in response to the Commission's inquiries as to the method and timing of § 272(e)(1) reporting, AT&T proposes that BOCs provide these data by state, update them monthly within ten calendar days after month's-end, and post their reports on the Internet as well as filing them with the Commission. In keeping with the plain language of § 272(e)(1), reports should disclose information separately for the BOC itself and for each relevant BOC affiliate.

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Pursuant to Section 1.415 of the Commission's Rules, and its First Report and Order and Further Notice Of Proposed Rulemaking released December 24, 1996 ("FNPRM"),¹ AT&T Corp. ("AT&T") submits these comments concerning the public disclosure requirements necessary to implement § 272(e)(1) of the Telecommunications Act of 1996.

In its order, the Commission established rules implementing the non-accounting structural separation, transactional, and nondiscrimination requirements that § 272 of the Act imposes in connection with, among other things, a BOC's provision of in-region interLATA services.² With that

¹ First Report and Order and Further Notice of Proposed Rulemaking, Implementation of Non-Accounting Safeguards of Sections 271 and 272 of the Telecommunications Act of 1934, as Amended, CC Docket No. 96-149, FCC 96-489, released Dec. 24, 1996 ("NPRM").

² 47 U.S.C. § 272(b)(1).

order, the Commission also issued an FNPRM, requesting comment "on specific disclosure requirements to implement [the nondiscrimination requirements of] section 272(e)(1)."³

ARGUMENT

I. The Commission Should Adopt A Modified Version Of The Disclosure Requirements Proposed In FNPRM Appendix C

As the Commission recognized in its order, unless it imposes specific disclosure requirements pursuant to § 272(e)(1), "parties will be unable readily to ascertain how long it takes a BOC to fulfill its own or its affiliates' requests for service."⁴ The report format the Commission proposes in FNPRM Appendix C contains precisely the types of measures that will be essential to implementing § 272(e)(1)'s requirements for provisioning of exchange access, and AT&T strongly supports adoption of these criteria.

As the FNPRM suggests, and as AT&T showed in its comments, the existing ONA disclosure requirements measure only average response times.⁵ If these types of measures

³ FNPRM, ¶ 16. While the Commission has concluded that only the nondiscrimination obligations of Section 272(e)(1) warrant disclosure requirements at this time, the remaining nondiscrimination requirements of Section 272 provide the Commission an ample, independent basis to adopt the quality disclosure measures set forth in the FNPRM and described in these comments.

⁴ FNPRM, ¶ 242.

⁵ Id., ¶¶ 362-363; AT&T Comments, pp. 36-38.

were used to monitor § 272(e)(1) compliance, BOCs could simply provision their time-sensitive requests rapidly, while maintaining relatively longer intervals for less urgent requests -- and could reverse this practice when provisioning competitors -- and thus disguise significant discriminatory practices. The FNPRM is also correct in expressing doubts as to the adequacy of ARMIS reports, because these reports are filed on an annual basis and are designed to measure services provided to end-users, not carrier-to-carrier services.⁶

In contrast, the measures proposed in Appendix C are expressly designed to measure BOCs' exchange access provisioning and maintenance practices. In addition, as AT&T previously demonstrated, these measures are based on those aspects of access provisioning and maintenance that carriers themselves consider important and historically have used.⁷ Moreover, because these measures have been structured to capture more than simple averages -- by capturing the "tails" in terms of percentages achieved in successive periods -- they reduce the risk that "nondiscriminatory" mean performance would mask

⁶ FNPRM, ¶ 382.

⁷ Letter to William F. Caton, FCC, from Charles E. Griffin, AT&T, Ex Parte - CC Docket No. 96-149, October 3, 1996, Attachment, p. 2.

competitively significant discrimination in specific circumstances. As a result, the measures proposed in the FNPRM can help deter some of the more blatant potential abuses concerning exchange access.⁸

At the same time, the disclosure requirements proposed in FNPRM can and should be improved. Specifically, as set forth below, modification of the proposed measures concerning exchange access could significantly enhance the deterrence and detection of discriminatory behavior. Further, consistent with the explicit language of Section 272(e)(1), as well as the Commission's own rationale in proposing exchange access measures, the Commission should

⁸ The proposed measures also permit BOCs to keep confidential competitively sensitive data such as the actual numbers of lines their affiliates have requested. Thus, the concerns expressed by some BOCs that they may be required to reveal sensitive information are unfounded. See FNPRM, ¶ 378. In addition, Bell Atlantic's claim that metrics such as those used in Appendix C improperly require data concerning "intermediate checkpoints" reveals a misunderstanding of the purpose of the measures. See id., ¶ 365. Each metric proposed by AT&T relates directly to elements of the access provisioning process that are important to carrier and end user planning and preparation for service, and therefore are of competitive significance. In addition, the disclosure of data in terms of percentages of requests completed within successive 24-hour periods represents a compromise that avoids some of the shortcomings of averaging, while permitting BOCs to avoid revealing absolute numbers of service requests. The purpose of these measures is not to check "intermediate" points, but to measure matters of most significance to customers, and examine patterns that may be hidden by simple averages.

also adopt disclosure requirements in connection with the BOCs' provision of local exchange service.

A. The Commission Should Modify The Proposed Requirements To Facilitate The Detection Of Discrimination In The Provision Of Exchange Access

First, one of the service categories in FNPRM Appendix C, Service Category 2, should be modified. Category 2 concerns the "Time From BOC-Promised Due Date To Circuit Being Placed In Service," measured in terms of percentage of circuits installed within successive 24-hour periods. This metric would permit discrimination to go undetected, because it measures only a BOC's performance against its own, unmonitored scheduling. If a BOC routinely promised to complete equivalent requests for its competitors in a longer period than it promised for itself or its affiliate, but met its self-imposed deadline in each case, this metric would indicate that no discrimination was occurring despite the fact that competitors would be forced to accept longer service intervals.

The first Service Category in Appendix C, "Successful Completion According to [Customer-] Desired Due Date," does not fully correct this shortcoming, because it does not capture by how much a BOC fails to meet customer-desired due dates. Thus, a failure to meet a customer's desired due date by one day would be reflected no

differently from a failure to meet that due date by six months.

In order to obtain more useful information, the Commission should adopt one of two options. Service category 2 could be changed to "Time From Customer-Desired Due Date To Circuit Being Placed In Service." This measure would add additional, valuable information to Category 1, "Successful Completion According to Desired Due Date," by disclosing the extent to which a BOC fails to provision circuits by the customer-desired due date. While this measure may be deemed imperfect because customer-desired due dates are outside a BOC's control, they remain the best available measure of how urgently a customer needs an order completed. Further, in competitive markets, suppliers must seek to meet their customer's requested due dates, not merely self-imposed deadlines. It accordingly makes no sense to leave BOCs free to set provisioning timetables unilaterally.

Alternatively, the Commission could add an additional metric to those proposed in Appendix C, "Time from Service Request to Installation," which would be measured in terms of percentage installed within each successive 24-hour period until 95% completed. While of limited significance for any given service request -- because in a particular instance a customer may or may not

urgently need service -- this metric would allow an assessment of parity in provisioning intervals across all service requests, based on the actual time of request and actual service installation. As such, this would at least reduce the opportunity for a BOC to mask discrimination through manipulation of the BOC's own promised due dates.

Second, the Commission should add to its proposed categories a measure that would require BOCs to report, as a percentage of installations for which a BOC-established deadline was missed, whether the BOC informed its "customer" (here, the BOC itself or one of its affiliates) that it would not be able to meet its promised schedule. This metric, "Jeopardy Notification Provided," is a critical adjunct to Category 2 in Appendix C, which measures the time from a BOC's promised due date to the date a circuit is actually placed in service.

When AT&T or another carrier promises one of its customers that a particular service or functionality will be ready by a given date, it often does so in reliance on an underlying BOC-promised installation. AT&T's customers, in turn, plan their own equipment installations and other activities around the due dates which AT&T has promised them. It is inevitable that BOCs will sometimes fail to meet provisioning deadlines; however, a BOC often will know in advance that it will not be able to meet its promised

delivery date. If a BOC notifies AT&T that it is behind schedule before the deadline actually passes, then AT&T can inform its own customers so that they can adjust their plans or make interim arrangements. When AT&T is forced to miss one of its customer's deadlines due to slippage in a BOC's provisioning schedule, that customer is inevitably disappointed with AT&T's service. If AT&T is unable to inform its customers in advance that it will miss a deadline, that customer will be even more displeased.

A BOC could discriminate against its competitors in a very significant way simply by giving advance notice to itself and its affiliates when a deadline will be missed, while keeping competitors in the dark about such occurrences. This risk is heightened by the fact that BOC personnel will share a corporate affiliation, and often have personal relationships with each other, increasing the risk that they would be more inclined to advise the BOC affiliate about the potential for missed deadlines. A Jeopardy Notification metric is a simple means to assess whether this is in fact occurring.

Third, AT&T urges the Commission to adopt three of the additional metrics originally proposed in AT&T's October 3, 1996 *ex parte* presentation in this docket.⁹

⁹ See AT&T Oct. 3 *ex parte*, at 5.

Because FNPRM Appendix C proposes to measure only the speed with which a BOC provides service, it appears to neglect the Commission's own conclusion that § 272(e)(1) "requires the BOCs to treat unaffiliated entities on a nondiscriminatory basis in completing orders for telephone exchange service and exchange access...."¹⁰ A BOC could not reasonably be deemed to have provided nondiscriminatory service if an unaffiliated entity is provisioned with lower quality or less reliable services than the BOC provides itself, regardless of the speed with which service orders are filled. For example, no reasonable interpretation of § 272(e)(1) could conclude a BOC satisfies its obligations under that section if it completes a competitor's requests for installation of new circuits within the same number of days that it provisions its own equivalent requests, but the competitor's circuits are 50% more likely to fail within thirty days of installation. The metrics proposed in Appendix C thus measure only one facet of service intervals.

In order to prevent discrimination based on the type or quality of exchange access provisioning a BOC provides, the Commission should require BOCs to report three additional quality-related metrics. The first of these, "Incidence of New Circuit Failures," is a simple quality

¹⁰ FNPRM, ¶ 239 (emphasis added).

measure designed to track the percentage of new circuits which fail within 30 days of installation. Even if a BOC were providing new circuits to a competitor within the same time frames that it provided them to itself or its affiliates, differential failure rates would be a compelling indicator that a BOC was meeting its service interval obligations only by provisioning competitors with inferior technology, inferior quality components, or inferior installations.

Next, a "Failure Frequency" metric, analogous to "Incidence Of New Circuit Failures," should be adopted to measure failure rates for existing circuits purchased from a BOC, rather than new installations. Again, differential failure rates for this measure would strongly suggest that a BOC was favoring itself or its affiliates in providing exchange access.

Finally, a "Network Repeat Failure" measure should be adopted to assess the quality of a BOC's repairs, as determined by examining the percentage of its repairs to its own circuits or those of its affiliates that experienced a subsequent failure within 30 days of an initial trouble report. A differential in this metric could reveal that a BOC's efforts to repair problems experienced by their competitors were simply "quick-fixes," while repairs to its own facilities were the product of more extensive trouble-

shooting. This metric can also reveal discrimination in the quality of the circuits or other technology a BOC offers to itself and its affiliates, versus that which it provides other parties.

AT&T's proposed report format for exchange access, which incorporates the FNPRM Appendix C proposals with the modifications described above, is attached as Exhibit 1 to these comments.

B. The Commission Should Adopt Additional Disclosure Requirements To Facilitate The Detection Of Discrimination In The Provision Of Exchange Service

The service categories proposed in FNPRM Appendix C only measure BOCs' provisioning of exchange access. In contrast, the plain language of § 272(e)(1) mandates nondiscriminatory fulfillment of requests for telephone exchange service as well. That section requires a BOC to

fulfill any requests from an unaffiliated entity for telephone exchange service and exchange access within a period no longer than the period in which it provides such telephone exchange service and exchange access to itself or to its affiliates

(emphasis added). The Commission is, of course, required to give effect to all parts of § 272(e)(1).¹¹ Accordingly, the

¹¹ See, e.g., FAA v. Robertson, 422 U.S. 255, 261 (1975) ("It is axiomatic that all parts of an Act, if at all possible, are to be given effect.") (internal quotation omitted).

FNPRM errs when it dismisses the "Interconnection and Collocation Performance Report" proposed in Teleport's October 24, 1996 *ex parte* presentation on the grounds that it addresses "local competition" rather than "service intervals provided by the BOCs."¹²

Further, the Commission's order found that § 272(b)(1)'s requirement that BOCs and their § 272 affiliates "operate independently" prohibited, *inter alia*, these entities from jointly owning "facilities used to provide local exchange and exchange access service."¹³ One of the chief reasons for this restriction was that if BOCs and their affiliates could jointly own such facilities, "the affiliate would not have to contract with the BOC to obtain such facilities, thereby precluding a comparison of the terms of transactions between a BOC and a section 272 affiliate with the terms of transactions between a BOC and a competitor of the section 272 affiliate" as required by § 272(e)(1).¹⁴ Thus, the Commission expressly sought to require BOCs and their affiliates to contract for both exchange access and local exchange services so that provisioning for both could be monitored to detect potential discrimination.

¹² FNPRM, ¶ 382.

¹³ Id., ¶ 160 (emphasis added).

¹⁴ Id.

Moreover, even apart from the potential to impede local competition, there is no basis to exclude local exchange-related service intervals from the disclosure requirements the Commission will establish to implement § 272(e)(1). A BOC could use the discriminatory provision of local exchange services and facilities as a way to impede interLATA competition by carriers that seek to provide packages of local and long distance services. Thus, even if only here concerned with interLATA competition, the Commission should adopt disclosure requirements relating to the provision of local exchange service.

Attached as Exhibit 2 is a proposed format for a § 272(e)(1) disclosure report concerning telephone exchange service. AT&T urges the Commission to adopt disclosure requirements based on metrics such as those in Exhibit 2 and on similar proposals being developed by others in the industry. Exhibit 2's disclosure categories do not represent a comprehensive set of metrics by which a BOC's conduct could be measured. Instead, as with the exchange access measures included in Exhibit 1, the metrics AT&T proposes are designed to obtain reports on a minimum set of the most significant service interval activities in which the BOCs will be engaged. Of course, because of the relative complexity of local service, and the absence of experience with its competitive provision, the categories

subject to disclosure are more numerous than in the exchange access context. As local competition develops, and the Commission and the industry gain more experience in this area, the Commission can refine these requirements, perhaps adding some measures and modifying others.

II. Method and Timing Of Section 272(e)(1) Reporting

A. Section 272(e)(1) Reports Should Be Published On The Internet In A Standardized Format, With A Copy Of The Reports Filed With The Commission, And Retained, Along With Underlying Data, By The BOCs

The FNPRM also addresses a number of threshold issues concerning the method and timing of § 272(e)(1) reports. Among these, the Commission tentatively concludes that the BOCs "must make . . . information available to the public in at least one of their business offices," and seeks comment on whether the information "should also be available electronically," either via the Internet or through another mechanism.¹⁵

The Commission should require that § 272(e)(1) reports be made available on the Internet via Web pages maintained by the BOCs.¹⁶ Information can be published on the Internet with very little cost and effort, and can thereby be made readily available to any firm that relies on a BOC for any of the services covered by § 272(e)(1).

¹⁵ Id., ¶ 370.

¹⁶ Id.

Merely making reports available for copying at the BOCs' offices will force firms seeking access to these data to bear the costs of sending a representative to those locations on a monthly or quarterly basis to retrieve reports of no more than a few pages, an expense that could prove prohibitive for small companies. Moreover, to meaningfully assess trends in § 272(e)(1) reports over time, it would almost certainly be necessary to put these data in computerized form. Documents published on the Internet could be readily downloaded into spreadsheet or database programs, while paper copies would require manual data entry.

To specify procedures for posting or correcting the reports on the Internet, the Commission should establish guidelines patterned after those that will be adopted for electronic tariff filings pursuant to its recent LEC Tariff Streamlining Order.¹⁷ In that docket, the Commission charged the Common Carrier Bureau with developing an Internet-based tariff filing system that will be similar in key respects to that which should be adopted in this proceeding. Notably, an electronic posting system for § 272(e)(1) reports should be considerably simpler than that

¹⁷ See Report and Order, Implementation of Section 402(b)(1)(A) of the Telecommunications Act of 1996, CC Docket No. 96-187, FCC 97-23, released January 31, 1997, ¶¶ 41-48.

required for tariffs. The reports themselves will be much shorter and less numerous than tariff filings. In addition, while parties that wish to challenge LEC tariff filings will have as little as three days to do so, § 272(e)(1) reports are not subject to the same exigencies, but are instead an ongoing instrument for monitoring BOCs' compliance with that section.¹⁸

To reduce the risk of tampering with Internet-posted reports,¹⁹ the Commission also should reject the FNPRM's tentative conclusion that BOCs should not be required to submit § 272(e)(1) reports to the Commission directly.²⁰ AT&T agrees with the Commission's goal of reducing "unnecessary administrative burdens on the BOCs,

¹⁸ To avoid disputes over the merits of particular software packages, the Commission need not require the use of any given program for electronic-form reports, but instead should simply require that § 272(e)(1) reports be downloadable from the Internet in some reasonably ubiquitous spreadsheet, database or similar form (e.g., as an Excel, Lotus, or PDF file), and as ASCII text. To facilitate both the Commission's and other parties' review of reports from multiple BOCs, all § 272(e)(1) reports should be in a standardized format -- that is, column and row headings and their ordering should be specified.

¹⁹ See generally AT&T Comments, filed October 9, 1996, at 13-15, in Implementation of Section 402(b)(1)(A) of the Telecommunications Act of 1996, CC Docket No. 96-187, Notice of Proposed Rule Making, FCC 96-397, released September 6, 1996

²⁰ See FNPRM, ¶ 369.

unaffiliated entities, and the Commission.”²¹ Failing to require the routine filing of these reports with the Commission, however, will only reduce marginally the administrative burden of reporting. Conversely, the existence of officially filed copies at the Commission would eliminate disputes concerning whether reports had been surreptitiously modified after their initial electronic posting, and eliminate the opportunity for such misconduct.

In addition, BOCs should be required to maintain copies of their § 272(e)(1) reports, as well as all of the data underlying them, for a period of at least two years. This is necessary to allow the Commission’s staff and complainants to verify both compliance with the statute and the accuracy of the reports.²²

B. Section 272(e)(1) Reports Should Be Prepared On A Monthly Basis

The FNPRM also asks whether the BOCs should update their § 272(e)(1) reports on a quarterly or monthly basis.²³ Reports should be prepared on a monthly basis, and should be posted on the Internet and filed with the Commission no later than 10 calendar days after the close of each month. Although several parties to this proceeding have suggested

²¹ FNPRM, ¶ 369.

²² See id., ¶ 379.

²³ See id.

quarterly reporting,²⁴ AT&T believes that this would not permit adequate monitoring of BOCs' provisioning practices. By the time a quarterly report was released, much of the information it contained would be several months old. This is simply too long to force BOCs' competitors to wait to learn that their customers may be receiving inferior service. For example, at the outset of local competition, customers will be very concerned as to whether CLECs can offer the same quality service offered by BOC incumbents, and may well abandon a CLEC very rapidly if they perceive that its service is inferior. If a CLEC must wait months to be able to discern a violation of § 272(e)(1) (much less to gather sufficient evidence to prevail in an enforcement proceeding), then it may suffer significant damage during that interim period. In addition, quarterly reports would provide only four data points for each year, further complicating efforts to review BOC compliance by masking monthly variations and making it difficult to establish statistically meaningful comparisons.

C. The Plain Language of Section 272(e)(1) Requires That Information Be Provided Separately For A BOC And For Each of Its Affiliates

The FNPRM also seeks comment on whether the BOCs should "aggregate their own requests and the requests of all

²⁴ See id.

of their affiliates for each service category, or whether they should maintain data for each affiliate and themselves separately."²⁵ By its plain language, § 272(e)(1) unequivocally prohibits BOCs from fulfilling requests from unaffiliated entities on terms less favorable than those on which it provides service to "itself or to its affiliates." The section's mandate is phrased in the disjunctive so as to prohibit any sort of "averaging" of response times between a BOC and its corporate siblings. To lump together provisioning data for a BOC and its affiliates could permit a BOC to move its most profitable customers (or those most likely, or able, to consider taking their business to a competitor) to an affiliate, and then to provide better provisioning to that affiliate while offering slower response times to itself for remaining captive customers.

Despite protests by some BOCs that their provisioning is a wholly automated process or is too complicated to "game" in such a fashion, there are many subtle ways that such discrimination could occur. Further, as BOCs are permitted to offer in-region interexchange service and competitors begin to invade their former local monopolies, they will have new -- and powerful -- economic

²⁵ Id., ¶ 380.

incentives to find ways to advantage themselves or their affiliates.²⁶

D. Section 272(e)(1) Data Should Be Reported Separately By State

The FNPRM also asks whether data should be reported separately for each state, by BOC region, or at some other level of geographic aggregation.²⁷ Clearly, in order effectively to monitor BOCs' provisioning, both the Commission and competitors must have information that is sufficiently disaggregated to prevent noncompliance or discrimination from being masked by "averaged" data. To achieve this goal, § 272(e)(1) reports must, at a minimum, depict separate results for each state in a BOC's region. Rates of local infrastructure deployment by non-ILEC carriers, the timing of BOC entry into in-region interexchange markets, and state regulations could vary widely, and each of these factors will affect the pace of

²⁶ The Commission need not require BOCs to disclose provisioning data for carriers other than themselves and their affiliates. However, because much of the data relevant to § 272(e)(1) may involve metrics the BOCs themselves can most readily capture, the Commission should make clear that a BOC may not refuse to provide a requesting carrier with data concerning the BOC's provisioning of services to that carrier, using the same metrics the Commission requires BOCs to report concerning their provisioning of themselves and their affiliates. BOCs should not be permitted to frustrate meaningful monitoring of their activities by refusing to provide such data upon request.

²⁷ See FNPRM, ¶ 380.

the development of competition within each state. Thus, BOCs could have the incentive to provide themselves and their affiliates with superior service intervals in those states in which their former monopolies are eroding most rapidly, while allowing service intervals for themselves and their affiliates to lag in those states presenting little competitive challenge. Permitting the reporting of data at the regional level could mask this conduct, presenting the illusion of nondiscriminatory service intervals between the BOC and its competitors, even though the BOC is providing itself superior arrangements in those states where it actually faces competition. Moreover, state commission jurisdiction is defined by state boundaries, and these agencies may have an interest in, and an effect on, BOC behavior within their borders.

E. Level of Subcategorization

Paragraph 381 of the FNPRM seeks comment on the level of subcategorization that should be employed in § 272(e)(1) reports. First, AT&T supports the Commission's tentative conclusion that the information required in service categories four and six of FNPRM Appendix C should be reported by carrier identification code ("CIC"). For all of the other service categories in Appendix C, data should be broken down into three categories: DS3 and above; DS1; and DS0, as specified in Exhibit 1. Finally, service